

1 **LEILA W. MORGAN**  
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8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA  
10 **(HONORABLE MARILYN L. HUFF)**

11 UNITED STATES OF AMERICA,	)	CASE NO. 08CR0285-MLH
	)	
12 Plaintiff,	)	DATE: April 7, 2008
	)	TIME: 9:00 A.M.
13 v.	)	
	)	<b>DEFENDANT'S NOTICE OF MOTIONS AND</b>
14 ESMERALDA SALAZAR-SANDOVAL,	)	<b>MOTIONS IN LIMINE TO:</b>
	)	1) EXCLUDE EXPERT TESTIMONY ON THE
15 Defendant.	)	STREET VALUE OF MARIJUANA;
	)	2) EXCLUDE EXPERT TESTIMONY ABOUT THE
16	)	STRUCTURE OF DRUG ORGANIZATIONS;
	)	3) EXCLUDE EVIDENCE OF ALLEGED
17	)	"NERVOUSNESS" BY DEFENDANT;
	)	4) EXCLUDE ACTUAL BAGS OF MARIJUANA
18	)	FROM THE COURTROOM;
	)	5) PREVENT A COPY OF THE INDICTMENT
19	)	FROM BEING SUBMITTED DURING
	)	DELIBERATIONS;
20	)	6) EXCLUDE ANY 404(B) OR 609 EVIDENCE AS
	)	IMPROPER NOTICE HAS BEEN GIVEN;
21	)	7) EXCLUDE EVIDENCE OF "MUG SHOT"
	)	PHOTOS;
22	)	8) EXCLUDE POVERTY EVIDENCE;
	)	9) PROHIBIT VOUCHING BY PROSECUTION;
23	)	10) ALLOW ATTORNEY-CONDUCTED VOIR
	)	DIRE;
24	)	11) ORDER PRODUCTION OF TECHS BY THE
	)	GOVERNMENT.
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26 TO: KAREN HEWITT, UNITED STATES ATTORNEY, AND  
27 REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY:  
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Esmeralda Salazar-Sandoval, by and through her counsel, Leila W. Morgan, Federal Defenders of San Diego, Inc., brings these motions in limine and other trial motions to:

- 1) Exclude expert testimony on the street value of marijuana;
- 2) Exclude expert testimony about the structure of drug organizations;
- 3) Exclude evidence of alleged "nervousness";
- 4) Exclude actual bags of marijuana from the courtroom;
- 5) Prevent a copy of the indictment from being submitted during deliberations;
- 6) Exclude any 404(b) or 609 evidence;
- 7) Exclude evidence of "mug shot" photos;
- 8) Exclude Poverty Evidence;
- 9) Prohibit Vouching by the Prosecution;
- 10) Allow attorney-conducted voir dire;
- 11) Order the Production of TECHs Evidence.

Ms. Salazar-Sandoval brings this motion pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes, case law and local rules. These motions are based on the attached statement of facts and memorandum of points and authorities.

Respectfully submitted,

Dated: March 28, 2008

/s/ Leila W. Morgan  
**LEILA W. MORGAN**  
Federal Defenders of San Diego, Inc.  
Attorneys for Ms. Salazar-Sandoval

**CERTIFICATE OF SERVICE**

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

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Criminal Division  
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Dated: March 28, 2008

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